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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

SARAH MCCLAUGHLIN, individually,

Plaintiff,

v.

CITY OF SPOKANE, a political
subdivision of the State of Washington;
TREVOR WALKER, individually and in
his official capacity; CHRISTOPHER
JOHNSON, individually and in his
official capacity; and JOHN and JANE
DOES 1–40, individually and in their
official capacities, inclusive,

Defendants.

NO.

**COMPLAINT FOR DAMAGES
UNDER 42 U.S.C. § 1983 AND
WASHINGTON LAW**

JURY TRIAL DEMAND

COMES NOW the above-named Plaintiff, by and through her attorney of
record, Meaghan M. Driscoll and John Francis Connelly of Connelly Law
Offices, PLLC, and by way of claim allege upon personal knowledge as to
herself and her own actions, and upon information and belief upon all other
matters, as follows:

I. PARTIES

1
2 1. Plaintiff SARAH MCLAUGHLIN is the bereaved fiancée of
3 Robert Bradley. Mr. Bradley was shot and killed by Spokane Police Department
4 (the “SPD”) officers on September 4, 2022. Sarah had lived with her fiancé for
5 over two years at the time of the shooting. She was present in the home
6 alongside Robert’s two minor children at the time of the shooting and witnessed
7 the shooting and death of her fiancé in the back yard of the home. Plaintiff
8 brings claims in her individual capacity for deprivation of her constitutional
9 right to intimate association with her fiancé as well as individual claims for
10 negligent infliction of emotional distress.
11

12
13 2. Defendant CITY OF SPOKANE is a political subdivision within
14 the State of Washington. Among other things, the City of Spokane provides law
15 enforcement services through its police department, the Spokane Police
16 Department. SPD’s mission is supposed to include creating a safe and secure
17 environment in which to live, work, and visit, enforcing the law in a fair and
18 impartial manner to ensure the community’s safety, and protecting citizens from
19 harm. Defendant CITY OF SPOKANE employed police officers who responded
20 to the September 4, 2022 incident involving Robert Bradley described herein.
21 The civil rights violations delineated herein were proximately caused by
22
23

1 Spokane's customs, policies, and usages of using and authorizing the
2 unreasonable use of deadly and military-style force without legal cause.

3 3. At all relevant times, Defendants TREVOR WALKER,
4 CHRISTOPHER JOHNSON, AND JOHN AND JANE DOE OFFICERS AND
5 SUPERVISORS 1–40, were duly appointed officers and/or employees or agents
6 of Defendant CITY OF SPOKANE, subject to oversight and supervision by
7 CITY OF SPOKANE'S elected and non-elected officials. Defendants were
8 working under color of state law and within the course and scope of their
9 employment and agency at all relevant times described herein.
10

11 4. John and Jane Does 1–40 are entities and persons involved with the
12 unconstitutional reckless, wanton, unreasonable, and intentional acts described
13 herein. These entities and persons are not currently known to Plaintiff. Upon
14 discovery of their identities, Plaintiff reserves the right to add them as
15 Defendants in this cause of action.
16

17 II. JURISDICTION AND VENUE

18 5. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and
19 1343.
20

21 6. Venue is appropriate in the Eastern District of Washington pursuant
22 to 28 U.S.C. § 1391 because at least some of the defendants reside in this
23

1 judicial district and because the events and omissions giving rise to the claims
2 alleged here occurred within the Eastern District of Washington.

3 **III. STATUTORY COMPLIANCE**

4 7. On or about May 23, 2023, an administrative claim for damages
5 was served upon the City of Spokane.
6

7 8. Any prerequisites to the maintenance of this action imposed by
8 RCW 4.96 have accordingly been satisfied.

9 **IV. STATEMENT OF FACTS**

10 9. This case arises from the negligent, reckless, unprovoked, and
11 unjustified shooting of Robert Bradley by three Spokane Police Officers who
12 crept up on Mr. Bradley as he unloaded his van and opened fire before Mr.
13 Bradley was even aware of their presence. The Officers fired indiscriminately in
14 the direction of Mr. Bradley and his family home where his fiancé and two
15 minor children were located. Robert Bradley was shot nine times at point blank
16 range and killed in front of his fiancé and children.
17

18 10. On September 4, 2022, at approximately 6:30 PM, Mr. Bradley's
19 neighbor requested the SPD's services to serve a routine protection order related
20 to an ongoing property dispute. Mr. Bradley had just returned from a camping
21 trip and was unaware that a protection order had been issued two days prior.
22
23

1 11. The SPD unreasonably escalated what should have been a standard
2 police matter into one of unjustified, reckless, and impulsive aggression. They
3 approached the house as if conducting a military-style stealth raid of the Bradley
4 family home and ambushed Mr. Bradley in his driveway.

5
6 12. By way of illustration, at approximately 10:19 PM, SPD Officer
7 Johnson, Officer Walker, and Officer Leming pulled their police cruisers into
8 the dark alley behind the Bradley family home without activating their lights or
9 sirens. They parked three houses down, got out of their vehicles, drew their
10 weapons, and silently crept up to the corner of the garage of Robert and Sarah's
11 next-door neighbor, where they observed Robert unloading his van through the
12 passenger door.

13
14 13. Meanwhile, Robert Bradley and Sarah McLaughlin were still
15 unaware that a protection order had been issued and had yet to be served. Robert
16 was unloading his van from the camping trip and Sarah was inside the home
17 with the kids. Robert was hard of hearing and required hearing aids.

18
19 14. The officers observed Robert unloading the passenger side of his
20 van for some time before they moved in to make contact. Officer Johnson led
21 the way with his rifle aimed and ready. Mr. Bradley was completely oblivious of
22 their presence.
23

1 15. According to Officer Johnson's Body Camera at 22:19:37, having
2 waited until he was approximately six feet away from the passenger door,
3 Officer Chris Johnson announced, "Spokane Police let me see both hands," at
4 which point Robert Bradley lifted his head.

5
6 16. Two seconds later, at 22:19:39, the SPD Officers suddenly opened
7 fire, spraying bullets indiscriminately in the direction of Robert and the family
8 home. They did not give Robert any time to comply with commands or process
9 what was happening.

10 17. Mr. Bradley was shot multiple times by Officer Johnson. He fell to
11 the ground bleeding profusely and completely incapacitated. Despite the fact
12 that he was clearly incapacitated, Officer Johnson fired four additional shots into
13 Robert's body as he lay bleeding in his driveway and writhing in pain.

14
15 18. The sudden and reckless volley of gunfire resulted in bullets that
16 missed their mark. Several of the bullets that did not hit Robert or passed
17 through his body struck his house behind him, terrorizing Sarah who watched
18 helplessly while simultaneously fearing for her own life. Shell casings were
19 recovered on the back porch of the home.

20
21 19. At the time of the unreasonable and unnecessary shooting, Mr.
22 Bradley had been taken by complete surprise. He did not pose an immediate
23 threat to the safety of Officer Johnson, Officer Walker, or others, and he was not

1 actively resisting or attempting to evade arrest. Instead of attempting to serve the
2 order in a reasonable manner designed to decrease the chance of a violent
3 confrontation, SPD unnecessarily snuck up on him, surprised him, and executed
4 him in his back yard before he had any time to process what was happening.
5

6 20. SPD placed Sarah McLaughlin in direct and imminent danger of
7 being shot and killed by unreasonably escalating a routine police matter into a
8 commando-style ambush of the Bradley family home without any legal or
9 tactical justification. The way the SPD handled this protection order was entirely
10 unnecessary, negligent, reckless, deliberately indifferent to the rights of Mr.
11 Bradley and Plaintiff McLaughlin and fell well below the standard of care for
12 law enforcement.
13

14 21. After the shooting, Sarah watched in terror as the police cut off
15 Robert's clothes, applied tourniquets, and attempted to patch the numerous
16 bullet holes in Robert's torso and extremities. Sarah witnessed Robert bleeding
17 on the ground and crying in agony as he lay dying. She watched her fiancé in his
18 final moments as he lay naked on their gravel driveway, covered in dirt and
19 blood, and clinging to his life. The last time she saw her fiancé alive was when
20 medical personnel removed his body on a stretcher. Sarah never got to say
21 goodbye.
22
23

1 22. The Spokane Police Department improperly, unreasonably,
2 recklessly, and with deliberate indifference escalated a simple law enforcement
3 function into a stealth commando-style raid, handled the situation extremely
4 unprofessionally and poorly, and killed Robert Bradley without provocation and
5 before giving him an opportunity to process what was happening and comply.
6 Under the totality of circumstances, the conduct by these officers was well
7 below the standard of care, negligent, unreasonable, unnecessary, and reckless.
8

9 23. The above-described actions of the agents of Defendants were
10 outrageous and were taken with deliberate and reckless disregard for the
11 constitutional rights of Sarah McLaughlin and her physical and emotional safety
12 and well-being.
13

14 24. As a direct and proximate result of Defendants' above-described
15 negligent and reckless conduct, Sarah McLaughlin suffered extreme emotional
16 distress, mental anguish, fear, anxiety, trauma, depression, loss of
17 companionship, loss of consortium, loss of intimate association, destruction of
18 her relationship, and other general and special damages from watching her
19 fiancé's death and being placed in imminent threat of being struck by a bullet
20 and killed herself.
21

22 25. As a direct and proximate result of the breaches, failures, and
23 negligence of Defendants, as described above and in other respects as well,

1 Plaintiff has incurred and will continue to incur general and special damages in
2 amounts to be proven at trial.

3
4 **V. FIRST CAUSE OF ACTION**
(Federal Civil Rights Violation Under 42 U.S.C. § 1983)

5 26. Plaintiff hereby realleges and incorporates by reference each
6 paragraph of this Complaint as if fully stated herein.

7 27. Plaintiff SARAH MCLAUGHLIN had a cognizable interest under
8 the Free Association Clause of the First Amendment of the United States
9 Constitution to continued association with her fiancé, Robert Bradley. The First
10 Amendment protects those relationships that presuppose deep attachments and
11 commitments to the necessarily few other individuals with whom one shares not
12 only a special community of thoughts, experiences, and beliefs, but also
13 distinctively personal aspects of one's life.
14

15 28. Plaintiff had lived with her fiancé for over two years at the time of
16 his death. They were engaged and planned to be married. Their relationship was
17 personal and private, and they shared their lives together.
18

19 29. By virtue of the facts set forth above, the Defendants are liable for
20 compensatory and punitive damages for subjecting, or causing to be subjected,
21 Sarah McLaughlin, a citizen of the United States, to a deprivation of the right
22 guaranteed by the First Amendment to the Constitution of the United States and
23

1 42 U.S.C. § 1983, to be free from deprivations of her right to intimate
2 association with her fiancé, Robert Bradley. They did this by shooting her fiancé
3 in an unreasonable, dangerous, and violent manner without legal cause or
4 justification. Defendants are liable pursuant to law for depriving Sarah
5 McLaughlin of her right to free association and for punitive damages,
6 compensatory damages, and reasonable attorneys' fees and costs.
7

8 **VI. SECOND CAUSE OF ACTION**
9 **(State Law Claim for Negligent Infliction of Emotional Distress)**

10 30. Plaintiff hereby realleges and incorporates by reference each
11 paragraph of this Complaint as if fully stated herein.

12 31. Defendants owed a duty of care when engaging in law enforcement
13 functions.

14 32. Defendants owed a duty of reasonable care to avoid causing
15 foreseeable harm to persons with whom they foreseeably interact in planned law
16 enforcement operations, especially those involving the likely use of deadly
17 force; to avoid placing members of the community in harms way while engaging
18 in law enforcement operations; and to ensure the safety of the surrounding
19 community.
20

21 33. Defendants owed a duty to refrain from negligently, unreasonably,
22 recklessly, and wantonly using deadly force against citizens; needlessly and
23

1 dangerously escalating routine law enforcement encounters; failing to secure the
2 scene; and creating a deadly force situation, among other duties.

3 34. Defendants owed a duty to ensure that the officers in its agency are
4 fit for service and properly trained in police standards and protocols regarding
5 control of a scene, dealing with citizens so as not to unnecessarily escalate
6 encounters, and to be familiar with and follow proper and reasonable standards
7 and training regarding the use of deadly force.
8

9 35. Defendants breached these duties when Spokane Police Department
10 officers negligently and recklessly escalated a routine service of a protection
11 order into the use of deadly force; engaged in the improper, unreasonable,
12 unnecessary and excessive use of force; and shot repeatedly towards Robert
13 Bradley and in the direction of the family home.
14

15 36. Defendants breached these duties when SPD officers failed to
16 control the scene and placed Sarah McLaughlin at risk of death by firing shots
17 into the house and causing her to fear for her life.
18

19 37. Defendants breached these duties as described above, and in other
20 ways, which may become known through the course of discovery.

21 38. The negligent and unreasonable actions of Defendants occurred
22 while the officers were in the course of their police work and amounted to
23 negligence that created a risk of harm, and actual harm, which ultimately

1 resulted in the death of Robert Bradley and severe emotional distress to Sarah
2 McLaughlin. The officers' actions were unreasonable, excessive, and well
3 outside the standards that reasonable police officers follow when interacting
4 with citizens.

5
6 39. As a direct and proximate result of the Defendants' negligence and
7 recklessness, unreasonable conduct, and failure to follow proper police practices
8 and procedures, Plaintiff Sarah McLaughlin suffered serious emotional anguish
9 and trauma, including severe emotional distress. Only a few feet away from her
10 fiancé, Sarah was a bystander and in the zone of danger and watched in shock
11 and horror as her fiancé was needlessly shot by SPD officers acting under color
12 of law and suffered a painful death.

13
14 40. As a direct and proximate result of Defendants' negligence and
15 infliction of emotional distress, Plaintiff has suffered significant general and
16 special damages which will continue to accrue and will be proven in greater
17 specificity at trial.

18 **VII. PRAYER FOR RELIEF**

19
20 WHEREFORE, Plaintiff requests that the Court enter judgment against
21 the Defendants:

- 22 (a) Consolidation of this case with *Bradley, et. al. v. City of Spokane,*
23 *et. al.*, E.D. Wash. No. 2:24-cv-00189-MKD;

- 1 (b) Compensatory damages;
- 2 (c) Punitive damages from the individual Defendants on Plaintiff's
- 3 claims under 42 U.S.C § 1983;
- 4 (d) Costs, including reasonable attorneys' fees, under 42 U.S.C. § 1988
- 5 and to the extent otherwise permitted by law; and
- 6 (e) Awarding such other and further relief as the Court deems just and
- 7 proper.
- 8
- 9

10 DATED this 22nd day of August 2024.

11 CONNELLY LAW OFFICES, PLLC

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13

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